

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COURTESY COPY

MEDITERRANEAN SHIPPING COMPANY S.A.,

Plaintiff,

1:07-cv-7438 (Hellerstein)

-against-

NOTICE OF MOTION

WORLDWIDE PAPER CO., d/b/a SINGAPORE
RECYCLE CENTRE PTE LTD., d/b/a XINTAR
INTERNATIONAL TRADING AND TECHNOLOGIES,
INC., d/b/a SCT CO., LTD., d/b/a PENINPLASTIC S.L.
d/b/a OSK PAPER INTERNATIONAL INC.,

Defendants.

PLEASE TAKE NOTICE that Plaintiff, MEDITERRANEAN SHIPPING COMPANY S.A., by its attorneys, MAHONEY & KEANE LLP, will move this Court before the Honorable Alvin K. Hellerstein, at The United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY, on January 31, 2008, at 9:00 AM, or as soon thereafter as counsel may be heard for an order, pursuant to Rule 6 of the Federal Rules of Civil Procedure, granting Plaintiff an extension nunc pro tunc to make service of process pursuant to Supplemental Rule B of the Federal Rules of Civil Procedure, and for such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, NY

January 15, 2008

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/18/08

*Time to effect
service of process is
enlarged to March 21, 2008,
and will not again be enlarged!*
1-17-08
A. Hellerstein

Respectfully submitted,

MAHONEY & KEANE, LLP.
Attorneys for Plaintiff
**MEDITERRANEAN SHIPPING
COMPANY S.A.**

By: 

Edward A. Keane (EK 1398)
111 Broadway, 10th Floor
New York, NY 10006
Tel. (212) 385-1422
Fax (212) 385-1605
Our File No. 12/3441

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MEDITERRANEAN SHIPPING COMPANY S.A.,

Plaintiff,

-against-

WORLDWIDE PAPER CO., d/b/a SINGAPORE
RECYCLE CENTRE PTE LTD., d/b/a XINTAR
INTERNATIONAL TRADING AND TECHNOLOGIES,
INC., d/b/a SCT CO., LTD., d/b/a PENINPLASTIC S.L.
d/b/a OSK PAPER INTERNATIONAL INC.,

Defendants.

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DECLARATION IN
SUPPORT OF PLAINTIFF'S
NUNC PRO TUNC EX
PARTE MOTION TO
EXTEND TIME TO SERVE
PROCESS

I, Edward A. Keane, an attorney duly admitted to practice before this Court,
hereby declare as follows:

1. I am a partner in the law firm of MAHONEY & KEANE, LLP, counsel of record to Plaintiff, MEDITERRANEAN SHIPPING COMPANY, S.A. ("MSC"). As such, I am familiar, based upon my review of the file maintained by my office, with the pleadings and proceedings heretofore had herein.

2. Herewith attached are true copies of the following:

Exhibit # 1: Summons and Complaint;

Exhibit # 2: Affidavit in Support of Plaintiff's Prayer for Attachment and Garnishment;

Exhibit # 3: Ex Parte Order of Attachment and Garnishment and Writ of Attachment;

3. Plaintiff is seeking to recover from defendants \$1,244,182.87 in ocean freight and other charges relating to a shipment of paper goods from the United States to various points in Asia. (Ex. 1).

4. On or about August 22, 2007, Plaintiff commenced an action in the Southern District of New York against the referenced Defendants. (Id.). And, as none of the defendants are found within the district, an Ex Parte Order of Attachment was the issued by the Court. (Ex. 3).

5. Plaintiff has since made daily service of the Ex Parte Order on several garnishee banks in the Southern District.

6. To date \$25,000.00 has been restrained from defendant SINGAPORE. Counsel has appeared on behalf of the res restrained from defendant.

7. Upon information and belief, however, defendants are still doing business involving United States currency transactions plaintiff expects further electronic funds transfers belonging to defendants and subject to attachment to pass through New York banks.

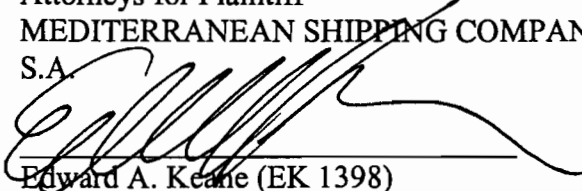
Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, NY

January 15, 2008

Respectfully submitted,
MAHONEY & KEANE, LLP.
Attorneys for Plaintiff
MEDITERRANEAN SHIPPING COMPANY
S.A.

By:


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